

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MICHIGAN

IN RE:

Alisa R. Byrnes

Debtor(s)

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CASE NO. 19-01427

HON. SCOTT W. DALES

**DEBTOR'S MOTION TO EXTEND**  
**AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(c)(3)**

NOW COMES the Debtor, Alisa R. Byrnes, by counsel, Mapes Law Offices, and respectfully requests that this Court extend the Automatic Stay pursuant to 11 U.S.C. § 362(c)(3), and in support thereof, states as follows:

1. This Chapter 13 Case was filed on 04/03/2019.
2. The Debtor previously filed bankruptcy, Case no. 18-01839, under Chapter 13, on 04/23/18, which was dismissed on 11/14/2018.
3. The Debtor did not have any other pending bankruptcy cases in the preceding one-year period.
4. The Debtor did not have any prior case dismissed in the last year for any of the following reasons: failure to file or amend required documents without substantial excuse; failure to provide adequate protection as ordered by the Court; or failure to perform the terms of a plan confirmed by the Court.
5. There has been a substantial change in the financial affairs of the Debtor since the dismissal of the last case, and she reasonably believes that this case will be concluded with a discharge.
6. Shortly after the Debtor filed the previous bankruptcy case she became ill with an autoimmune disease which left her unable to work.
7. Since the previous case was dismissed the Debtor has begun receiving a disability benefits on a regular basis. She also intends to retire from her current employer and with social security benefits, and retirement benefits from her employer, the Debtor reasonably believes that she will be able to fund this Chapter 13 Plan.

WHEREFORE, the Debtor prays that this Honorable Court grant his Motion to Extend the Automatic Stay as to all creditors, after notice and opportunity to be heard, and for all such other relief as may be just and equitable.

Dated: 04/08/2019

/s/ Jeffrey D. Mapes

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